

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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Return Date: February 11, 2025  
Time: 10:00AM

IN RE:

Robert Grant, Jr.,

Case No. 24-35154-kyp  
Chapter 13

**NOTICE OF MOTION TO COMPEL  
THE HEKA GROUP, LLC CRAIG  
WATSON TO DISCONTINUE THEIR  
ACTION AGAINST THE DEBTOR**

Debtor.

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**SIRS:**

**PLEASE TAKE NOTICE**, the Debtor named herein, by Julius A. Rivera, Jr., his Attorney, will move before Honorable, Kyu Y. Paek, United States Bankruptcy Judge, at the Courthouse located at 355 Main Street, Poughkeepsie New York 12601 on the 11<sup>th</sup> day of February, 2025 via Videoconference through Zoom at 10:00 o'clock in the forenoon or as soon thereafter as counsel can be heard, for an Order to compel The Heka Group, LLC Craig Watson to discontinue their action against the Debtor and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that answering papers, if any, shall be served and filed at least three (3) days prior to the return date thereof.

Dated: Poughkeepsie, New York  
January 8, 2025

Yours, etc.

/s/Julius A. Rivera, Jr., Esq.  
JULIUS A. RIVERA, JR. ESQ.  
Attorney for Debtor  
309 Mill Street  
Poughkeepsie, New York 12601  
(845) 452-1422  
riveralaw@yahoo.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

Robert Grant Jr.,

Case No. 23-35417-kyp  
Chapter 13

**Motion**

Debtor.

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**TO: Honorable Kyu Y. Paek, United States Bankruptcy Judge**

1. This case was filed on February 16, 2024.
2. On May 13, 2024, The Heka Group, LLC Craig Watson filed a suit against the Debtor in the Supreme Court of the State of New York, Orange County, Index #003856-2024. See attached.
3. On August 7, 2024, this office notified DeTravius Bethea, Esq. of the Bethea Law Firm, LLC, counsel for The Heka Group, LLC Craig Watson that this case was filed and of the effect of the automatic stay and consequence of the violated stay. See attached.
4. Neither The Heka Group, LLC Craig Watson or their counsel has discontinued their action against the Debtor. See attached recent order for the Debtor to appear in state court.
5. The filing and continued prosecution of the action is in violation of the automatic stay.

6. It is requested that the Court order that The Heka Group, LLC Craig Watson to discontinue their action against the Debtor and pay for the costs and attorney fees incurred to bring this Motion.

**WHEREFORE**, it is respectfully requested that the Motion of the Debtor be granted as well as such other and further relief as the Court deems just and proper.

Dated: Poughkeepsie, New York  
January 8, 2025

Yours, etc.

/s/Julius A. Rivera, Jr., Esq.  
JULIUS A. RIVERA, JR. ESQ.  
Attorney for Debtor  
309 Mill Street  
Poughkeepsie, New York 12601  
(845) 452-1422  
riveralaw@yahoo.com

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

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The Heka Group, LLC Craig Watson

Plaintiffs,

SUMMONS

Index No.: [Insert Index Number]

Vs.

Hunter Quest For Cupcakes LLC, Chantale Grant (also known as Chantale Bryant), Robert Grant, Brooke Nestor, Pyramid Management Group LLC, and Crystal Run LLC

Defendants.

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TO: Chantale Grant (also known as Chantale Bryant), Robert Grant, Hunter Quest For Cupcakes LLC, Crystal Run LLC, Pyramid Management Group LLC, and Brooke Nestor,

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case you fail to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint. This is a breach of contract action.

Dated: May 13, 2024

*DeTravius Bethea*

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DeTravius Bethea

The Bethea Law Firm, LLC

Attorney for Plaintiffs

43 W 43 Street, Suite 274

New York, NY 10036-7424

347.566.1095

## Robert Grant, Jr. 24-35154 - Chapter 13 Bankruptcy

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From: Julius Rivera (riveralaw@yahoo.com)

To: dbethea@bethealawfirm.com

Date: Wednesday, August 7, 2024 at 12:36 PM EDT

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Re: The Heka Group, LLC Craig Watson vs. Robert Grant  
Attn: DeTravius Bethea

Please be advised that Robert Grant, Jr. filed for Chapter 13 bankruptcy protection on 2-16-24 under case number 24-35154 in the Southern District of New York. Attached, is the Notice of Chapter 13 Bankruptcy Case filing.

As you may know, Section 362 of the United States Bankruptcy Code provides for an automatic stay of all action for money judgment against the debtor or the debtor's property regarding any attempt to collect a debt. Also, any violation of this stay will result in sanctions against the violators. Please send to my office via fax confirmation that this action has been stopped.

Thank you.

**Julius A. Rivera, Jr., Esq.**  
**Attorney and Counselor at Law**  
**Phone: 845-452-1422**  
**Fax: 866-914-4520**

**New York Offices:**  
**309 Mill Street**  
**Poughkeepsie, New York 12601**  
**(Mail to this address only)**

**806 South Street**  
**Peekskill, NY 10566**

**365 Route 211 East**  
**Middletown, NY 10940**

**957 Morris Park Avenue**  
**Bronx, NY 10462**

**Florida Office:**  
**529 N. Peninsula Drive**  
**Daytona Beach, FL 32118**  
**Phone: 386-523-2450**  
**Fax: 866-914-4520**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

THE HEKA GROUP, LLC CRAIG WATSON,

Plaintiff,

-against-

HUNTERS QUEST FOR CUPCAKES, LLC, CHANTALE  
GRANT (also known as CHANTAL BRYANT ), ROBERT  
GRANT, BROOKE NESTOR, PYRAMID MANAGEMENT  
GROUP LLC, and CRYSTAL RUN LLC.,

Defendants.

McElduff, A.J.S.C.

Movant Johnson Foley & Cirigliano, P.C.'s motion to withdraw as counsel for Defendant Hunter Quest for Cupcakes, LLC, is granted as unopposed.

Accordingly, it is hereby

ORDERED that Johnson Foley & Cirigliano, P.C. is hereby permitted to withdraw as counsel for the defendant, Hunters Quest for Cupcakes, LLC, in the above-captioned action; and it is further

ORDERED that the parties and/or counsel shall appear for a Preliminary Conference on January 10, 2025 at 9:30 a.m.; and it is further

ORDERED that movant shall serve a copy of this Order with Notice of Entry on all parties and file proof of same with the Court.

This constitutes the Decision and Order of the Court.

Dated: December 10, 2024  
Goshen, New York

  
\_\_\_\_\_  
Hon. Timothy P. McElduff, Jr., A.J.S.C.

SUPREME COURT : STATE OF NEW YORK  
COUNTY OF ORANGE

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THE HEKA GROUP, LLC, CRAIG WATSON,

Index #003856-2024

Plaintiffs,

**AFFIDAVIT OF MAILING**

-against-

HUNTERS QUEST FOR CUPCAKES, LLC,  
CHANTALE GRANT (also known as Chantale Bryant),  
ROBERT GRANT, BROOKE NESTOR,  
PYRAMID MANAGEMENT GROUP, LLC and  
CRYSTAL RUN, LLC,

Defendants.

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STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF ORANGE     )

Kim M. Kellermueller, being duly sworn deposes and says, that deponent is not a party to this action, is over the age of 18 years, and resides in Newburgh, New York.

That on the 18<sup>th</sup> day of December, 2024, deponent served the within **DECISION AND ORDER (Hon. Timothy P. McElduff, Jr., AJSC – 12.10.2024)**, upon the following:

DeTravius Bethea, Esq.  
The Bethea Law Firm, LLC  
43 W 43rd Street, Suite 274  
New York, NY 10036

Hunters Quest for Cupcakes, LLC  
43 Magnolia Park Road  
Middletown, New York 10940

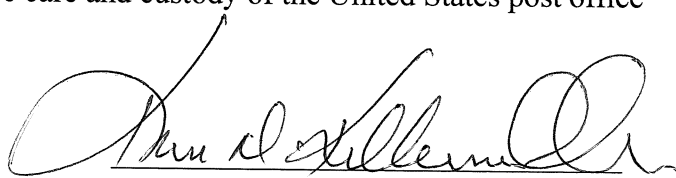
Chantale Grant (a/k/a Chantale Bryant)  
43 Magnolia Park Road  
Middletown, NY 10940

Robert Grant  
43 Magnolia Park Road  
Middletown, NY 10940

Crystal Run, LLC c/o Pyramid Companies  
Attn: General Counsel  
4 Clinton Square  
Syracuse, NY 13202

Brooke Nestor  
The Clinton Exchange  
4 Clinton Square  
Syracuse, NY 13202

By depositing a true copy of same *via regular mail* enclosed in a postpaid properly addressed wrapper, in a post office, under the exclusive care and custody of the United States post office department at Montgomery, New York.



Kim M. Kellermueller

Sworn to before me this  
14 day of December, 2024.

Notary Public

Kevin Foley  
Notary Public, State of New York  
NO. 02FO6155750  
Qualified Orange County  
Commission Expires Nov. 20 2025



SUPREME COURT : STATE OF NEW YORK  
COUNTY OF ORANGE

X

Index #003856-2024

THE HEKA GROUP, LLC, CRAIG WATSON,

Plaintiffs,

NOTICE OF ENTRY

-against-

HUNTERS QUEST FOR CUPCAKES, LLC,  
CHANTALE GRANT (also known as Chantale Bryant),  
ROBERT GRANT, BROOKE NESTOR,  
PYRAMID MANAGEMENT GROUP, LLC and  
CRYSTAL RUN, LLC,

Defendants.

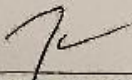
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PLEASE TAKE NOTICE that the within is a true copy of the DECISION AND ORDER signed  
by the HON. TIMOHTY P. McELDUFF, JR., AJSC on December 10, 2024 and entered by the Clerk of  
the within-named Court on December 10, 2024.

Dated: December 17, 2024  
Montgomery, New York

Yours, etc.,

JOHNSON FOLEY & CIRIGLIANO, PC

  
By: KEVIN FOLEY, ESQ.  
15 Scott's Corners Drive  
Montgomery, New York 12549  
Tel. (845) 457-5332

TO: DeTravius Bethea, Esq.  
The Bethea Law Firm, LLC  
*Attorneys for Plaintiffs*  
43 W 43rd Street, Suite 274  
New York, NY 10036

Hunters Quest for Cupcakes, LLC  
*Defendant*  
43 Magnolia Park Road  
Middletown, New York 10940

Chantale Grant (a/k/a Chantale Bryant)

*Defendant*

43 Magnolia Park Road  
Middletown, NY 10940

Robert Grant

*Defendant*

43 Magnolia Park Road  
Middletown, NY 10940

Crystal Run, LLC c/o Pyramid Companies

Attn: General Counsel

*Defendant*

4 Clinton Square  
Syracuse, NY 13202

Brooke Nestor

*Defendant*

The Clinton Exchange  
4 Clinton Square  
Syracuse, NY 13202

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

Robert Grant, Jr.,

Case No. 24-35154-kyp  
Chapter 13

Debtor.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Notice of Motion, Motion, and proposed Order was furnished to the following parties on the 8<sup>th</sup> day of January, 2025 by United States first-class mail and/or by electronic notification:

Thomas C. Frost, Esq.  
399 Knollwood Road, Suite 102  
White Plains, NY 10603

United States Trustee  
11A Clinton Avenue  
Room 620  
Albany, NY 12207

DeTravius Bethea  
The Bethea Law Firm, LLC  
43 W. 43<sup>rd</sup> Street, Suite 274  
New York, NY 10036-7424

Dated: Poughkeepsie, New York  
January 8, 2025

/s/Julius A. Rivera, Jr., Esq.  
JULIUS A. RIVERA, JR. ESQ.  
Attorney for Debtor  
309 Mill Street  
Poughkeepsie, New York 12601  
(845) 452-1422  
riveralaw@yahoo.com